

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION

GARY BRICE MCBAY,  
Plaintiff,

VERSUS CIVIL ACTION NO: 1:07cv1205LG-RHW

HARRISON COUNTY, MISSISSIPPI,  
by and through its Board of  
Supervisors; HARRISON COUNTY  
SHERIFF, George Payne, in his  
official capacity; CORRECTIONS  
OFFICER MORGAN THOMPSON,  
acting under color of state law,  
Defendants.

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**DEPOSITION OF REGINA L. RHODES**

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Taken at the offices of Brown Buchanan,  
P.A., 796 Vieux Marche' Mall, Suite 1,  
Biloxi, Mississippi, on Thursday,  
September 17, 2009, beginning at 2:22  
p.m.

**APPEARANCES:**

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SIM

**EXHIBIT**

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"C"

1 Q. So it was just kind of a risk you took  
2 working in booking; is that right?

3 A. It wasn't explained to me as that way.

4 Q. How was it explained to you?

5 A. That we were going to work in booking.

6 Q. If Jessie Lee Williams hadn't have been  
7 beat to death that night, do you think you would  
8 have gone to prison at all?

9 A. No, sir.

10 Q. There wasn't any real conspiracy, was  
11 there?

12 A. Conspiracy as in everybody wrote false  
13 reports, yes, they did.

14 Q. But not to murder somebody?

15 A. I don't believe there was a conspiracy  
16 to murder somebody.

17 Q. You testified at your trial that you  
18 didn't record these conversations except as to  
19 protect yourself if someone said something to the  
20 contrary; is that right?

21 A. Yes, sir.

22 Q. So your testimony today is that you did  
23 not tape-record these deputies, booking deputies  
24 that called you except as for future reference,  
25 that you were not trying to lower your own prison